

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

MULLER MARTINI CORP.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 07 CV 4378 (JNE/JJG)
	)	
GOSS INTERNATIONAL AMERICAS,	)	
INC. and GOSS INTERNATIONAL	)	
CORPORATION,	)	
	)	
Defendants/Third-Party Plaintiffs,	)	PLAINTIFF'S MOTION TO COMPEL
	)	DISCOVERY
	)	
v.	)	
	)	
MÜLLER MARTINI HOLDING AG,	)	
GRAPHIA HOLDING AG, MÜLLER	)	
MARTINI DRUCKVERARBEITUNGS	)	
SYSTEME AG, and MÜLLER	)	
MARTINI MARKETING AG,	)	
	)	
Third-Party Defendants.	)	

NOW COMES plaintiff, Muller Martini Corp., through its undersigned attorneys of record, and respectfully moves this Honorable Court under Rule 37 of the Federal Rules of Civil Procedure for an order compelling defendants, Goss International Americas, Inc. and Goss International Corporation, to provide discovery.

The ground for this motion is that, despite assurances that defendants would promptly produce documents relating to the device accused of infringing

Muller Martini's patent and despite defendants' insistence on an "aggressive" schedule, defendants have failed and refused to produce documents promised at the scheduling conference. Defendants have also refused to provide meaningful responses to Muller Martini's interrogatories to defendants. Muller Martini has attempted to reach an amicable resolution of this discovery stand-off, but defendants have steadfastly refused to either produce the documents requested or to provide meaningful interrogatory responses.

The facts on which this motion is based are set forth in the accompanying memorandum, along with supporting authority showing that Muller Martini's motion should be granted.

WHEREFORE, Muller Martini respectfully requests entry of an order in accordance with the prayer of this motion.

Respectfully submitted,

s/ Keith V. Rockey  
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